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Chamberlain

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN

Defendants.

CASE NO. 3:18-cr-00577-CRB

**Defendant Stephen Chamberlain's Joinder
in Defendant Michael Lynch's Oppositions
to Government Motions in Limine**

Date: February 21, 2024

Time: 2:00 p.m.

Place: Courtroom 6

Assigned to Hon. Charles R. Breyer

1 Defendant Stephen Chamberlain joins and incorporates herein Defendant Michael Lynch's
2 Oppositions to the Government's Motions in Limine Nos. 1 through 6. ECF Nos. 304, 305, 306,
3 307, 308 and 309.

4 With respect to the Government's Motion in Limine No. 5, which seeks to enforce
5 defendants' reciprocal discovery obligations, Mr. Chamberlain separately responds as follows:

6 First, he is not in possession of any information subject to disclosure under Federal Rules
7 of Criminal Procedure 16(b) or 26.2.

8 Second, he is not in possession of either his Autonomy laptop or a backup copy of its
9 contents. Indeed, there is reason to believe that those contents may contain exculpatory
10 information. If the government is in possession of—or later obtains possession of—such materials,
11 Mr. Chamberlain respectfully requests that the Government be ordered to produce them in
12 discovery.

13 The Court should deny the Government's Motions in Limine Nos. 1 through 6.

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15 DATED: January 31, 2024

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20 By: 

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